



March 23, 2022

Tina Namian
Chief, School Programs Branch, Policy and Development Division
4th Floor Food and Nutrition Service
1320 Braddock Place
Alexandria, VA, 22312

RE: Child Nutrition Programs: Transitional Standards for Milk, Whole Grain and Sodium (Final Rule), Docket No. FNS-2020-0038

Dear Ms. Namian,

On behalf of AASA, The School Superintendents Association, representing more than 13,000 public school superintendents, and The Association of School Business Officials International (ASBO), representing more than 30,000 school business professionals—we write to offer comments in response to the Child Nutrition Programs: Transitional Standards for Milk, Whole Grain and Sodium (Final Rule). It is our view that these transitional standards were set with good intentions by USDA and with the understanding that these standards would be reasonable and achievable for districts to meet. However, in light of the impending expiration of the COVID-19 waivers, these transitional standards will continue to prove problematic and onerous to meet as districts face significant supply chain challenges.

We are appreciative of the Department's willingness to engage stakeholders and understand the impact these standards have on school nutrition programs. By issuing these standards, the USDA continues to acknowledge the great work happening in schools to make meals more nutritious while listening to school leaders' call for some common-sense flexibilities. Burdensome nutritional provisions contribute to excess food waste, increased program costs, and reduced student participation that hamper schools' operational capacity. These flexibilities allow schools to provide healthy, well-balanced meals that are aligned with students' taste preferences.

The transitional standards forf(-)Tj isd

loss and must ensure their budgets balance. When a district's food service program exceeds its revenues, they are left with the difficult choice of either scaling back feeding programs, cutting staff (since labor is a significant cost), or reallocating funds meant for other education programs and services to continue feeding children.

The decision by Congress not to extend the COVID-19 waivers makes these reasonable transitional standards problematic as school districts face numerous challenges caused by the pandemic. Given the significant supply chain and labor challenges facing most districts as a result of the COVID-19 pandemic, and that food service programs are s